

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER, LLC, a
Washington limited liability company;
NORTHWEST NASAL SINUS CENTER P.S.,
a Washington professional service corporation;
and JAVAD A. SAJAN, M.D.,

Defendants.

NO. 2:22-cv-01835-RSM

**DECLARATION OF JAMES SANDERS
IN SUPPORT OF PERKINS COIE'S
MOTION TO WITHDRAW AS
COUNSEL**

NOTE ON MOTION CALENDAR:
April 17, 2024 pursuant to LCR 7(i)
(otherwise May 3, 2024)

I, James Sanders, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. RPC 1.16(a) applies to Perkins Coie's representation and requires withdrawal of counsel.

3. We advised Defendants Alderwood Surgical Center, LLC, Northwest Nasal Sinus Center P.S., and Javad A. Sajan, M.D., of the need to obtain successor litigation counsel and understand that Defendants are in the process of working to identify such counsel.

DECLARATION OF JAMES SANDERS ISO PERKINS
COIE'S MOTION TO WITHDRAW AS COUNSEL -1
(2:22-cv-01835-RSM)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
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5. Between April 12, 2024 and April 17, 2024, Defendants requested the State extend pending deadlines or to a temporary stay. The State agreed to temporarily extend a single discovery response deadline and delay two depositions but did not agree to any extensions or a stay.

I declare under penalty of perjury and the laws of the State of Washington that the foregoing is true and correct.

DATED this 17th day of April 2024, at Seattle, Washington.

By: /s/ James Sanders
James Sanders, WSBA #24565

DECLARATION OF JAMES SANDERS ISO PERKINS
COIE'S MOTION TO WITHDRAW AS COUNSEL -2
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